

RECEIVED

JUL 18 1990

REMEDIATION SECTION

40033383  
SUPERFUND RECORDS

Site: Syntex - Verona  
ID #: MOD007452154  
Break: 17.8  
Other: Spring River  
Correspondence

0751  
7-17-90  
K

July 17, 1990

Glenn Curtis  
United States Environmental Protection Agency  
Region VII  
726 Minnesota Avenue  
Kansas City, KS 66101

Re: Spring River Fish and Sediment Plan

Dear Glenn:

This letter confirms our understanding concerning the sampling and analysis of fish in the Spring River. Specifically, this letter outlines the agreement of Syntex Agribusiness, Inc. ("Syntex") to collect and analyze data for an additional year at Location 1 on the Spring River. The letter also briefly summarizes the sampling and analytical activities to date.

As we have discussed, Syntex agreed in a September 9, 1983 Consent Agreement and Order ("Consent Agreement") with the U.S. Environmental Protection Agency ("EPA") to prepare a plan for sampling, analyzing and reporting levels of 2,3,7,8-Tetrachlorodibenzo-p-dioxin ("2,3,7,8-TCDD") in the fish and sediment in the Spring River downstream from the Syntex Verona, Missouri facility. Syntex subsequently prepared, and EPA approved, a Verona Fish and Sediment Plan, as submitted to EPA on October 12, 1983 and revised on January 31, 1984 and March 9, 1984 ("the Plan"). The Consent Agreement and Plan require Syntex to sample and analyze Spring River fish and sediment for a five year period, with provisions for yearly extensions of the program under certain specified conditions. The Consent Agreement and Order also require Syntex to prepare a final report, including a statistical analysis of the collected data, at the end of the five year sampling program.

Syntex submitted the final report and statistical package to EPA on January 30, 1989. Upon careful analysis of the data collected from the Spring River over the five year period, Syntex concluded in the Report that additional sampling and analysis would not be productive. However, to accommodate EPA's wishes for the collection of additional data, Syntex agreed to sample and analyze fish from four locations on the Spring River in 1989, as set forth in my July 17, 1989 letter to you, and to prepare a report for EPA. This sampling was performed and an annual report was submitted to EPA on November 27, 1989. A statistical package analyzing the data collected during the six year period was submitted to EPA on February 21, 1990.

The February 21, 1990 report concluded that further sampling and analysis of Spring River fish would not be warranted. The report also indicated that

Glenn Curtis  
July 17, 1989  
Page 2 of 2

if EPA determined that additional sampling is needed, the sampling should cover only fish taken immediately downstream from the Syntex Verona, Missouri, facility (Location 1) and not from locations further downstream (Locations 2 through 4).

As we discussed, EPA has requested that Syntex conduct this additional sampling. Syntex agrees to undertake additional sampling and analysis as outlined below.

Using the same sampling techniques that are set forth in the Consent Agreement and Plan, fish will be collected during August, 1990 from the Spring River at Location 1 (0.3 miles downstream from the Verona facility). However, the fish will be prepared for an analysis of fillets from the two separate groups of fish, and the remaining fish parts will not be sent to the laboratory for analysis, or used for a computation of a whole body value, as described in Paragraph II of the Plan. In addition, the sample described in Paragraph II of the Plan consisting of four to ten bottom feeding fish will not be taken for whole fish analysis. These analyses and computations have not been included in our statistical analysis in the past, and have not otherwise proven to be useful.

Syntex will analyze the collected samples for 2,3,7,8-TCDD in accordance with the procedures described in Paragraph III of the Plan, and will subject the resulting data to the statistical analysis described in paragraph V of the Plan. The appropriateness of additional sampling and analysis in future years will be governed by the provisions of Paragraph 42 of the Consent Agreement.

Syntex will prepare a report to EPA concerning the sampling and analytical results developed during the seventh year of the study for the fish collected from Location 1. The report will be provided within 30 days of receipt and acceptance by Syntex of the analysis of the collected fish samples. Syntex will also prepare a report to EPA consisting of a statistical analysis of the fish data taken from Location 1 over the seven year period.

We believe that this plan conforms with the request made by EPA for an additional year of sampling and analysis. Accordingly, and in light of the imminence of the dates of the 1990 sampling, Syntex will proceed as outlined in this letter unless it hears from you to the contrary. If you have any comments or questions, please call me at (417) 866-4050.

Very truly yours,

SYNTEX AGRIBUSINESS, INC.



Gary J. Pendergrass, P.E.  
Manager, Environmental Projects

GJP:f1/0662P